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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO AND OAKLAND DIVISION

JOHN DOE and JANE DOE, on behalf of  
themselves and all others similarly situated,

Plaintiff,  
v.

META PLATFORMS, INC.,

**Defendant.**

) Case No. 3:22-cv-07557-SI  
)  
)  
)  
)  
**) STIPULATION AND [PROPOSED]  
) ORDER TO ADMINISTRATIVELY  
) RELATE CASES PURSUANT TO  
) CIVIL LOCAL RULE 3-12 AND  
) CONSOLIDATE RELATED ACTIONS  
) UNDER FED. R. CIV. P. 42(a)**

KATRINA CALDERON and DANIELLE CALDERON, on behalf of themselves and all others similarly situated.

**Plaintiffs,**

META PLATEFORMS INC

### Defendant

- 1 -

**STIPULATION AND ~~PROPOSED~~ ORDER  
TO ADMINISTRATIVELY RELATE ACTIONS UNDER CIVIL LOCAL RULE 12-3 AND TO  
CONSOLIDATE RELATED ACTIONS UNDER FED.R.CIV.P. 42(a)**

1 CRYSTAL CRAIG, TIFFANY )  
2 BRYANT and SAIT ) Case No. 3:23-cv-00315-TLT  
3 KURMANGALIYEV, Individually and )  
on Behalf of All Others Similarly )  
Situated, )  
4 Plaintiffs, )  
5 v. )  
6 META PLATFORMS, INC., )  
7 Defendant. )  
8

9 WHEREAS, the above-captioned related putative consumer class actions are pending  
10 before the United States District Court for the Northern District of California, entitled: *John Doe*,  
11 *et al. v. Meta Platforms, Inc.*, Case No. 3:22-CV-07557-SI, filed December 1, 2022 (“*Doe*”);  
12 *Katrina Calderon, et al. v. Meta Platforms, Inc.*, Case No. 5:22-cv-09149-SI (“*Calderon*”), filed  
13 December 29, 2022; and *Craig v. Meta Platforms, Inc.*, Case No. 3:23-cv-00315-TLT (“*Craig*”)  
14 filed January 23, 2023 (the “Related Actions” and all plaintiffs are collectively referred to herein  
15 as “Plaintiffs”);

16 WHEREAS, by Order dated January 24, 2023, this Court administratively related the *Doe*  
17 and *Calderon* Actions pursuant to Civil Local Rule 3-12;

18 WHEREAS, *Craig* also meets the definition of a related case under Civil Local Rule 3-12  
19 because it is brought against the same defendant, Meta Platforms, Inc., involves similar allegations  
20 that Meta surreptitiously acquired tax filing information from putative class members who used  
21 online tax filing websites such as H&R Block, Tax Act, and Tax Slayer, and asserts many of the  
22 same causes of action;

1           WHEREAS, there is the potential for burdensome duplication of labor and expense, and  
2 the potential for conflicting results if the cases are conducted before different judges such that they  
3 should be designated as Related under Civil Local Rule 3-12;

4           WHEREAS, Plaintiffs assert the Related Actions arise out of the same or a similar set of  
5 operative facts and assert similar legal claims against Defendant Meta Platforms, Inc. (“Meta” or  
6 “Defendant”), alleging that Meta’s “Pixel” is a piece of code that logs users’ activities on third-  
7 party websites and sends the details back to Meta. Plaintiffs allege that online tax-filing services  
8 such as H&R Block, TaxAct, and TaxSlayer embedded the Pixel in their websites and sent tens of  
9 millions of filers’ tax-return data to Meta without their consent in violation of federal law.  
10 Plaintiffs further allege the Pixel sent Meta the tax-filers’ names, email addresses, adjusted gross  
11 incomes, tax-filing statuses, refund amounts, dependents’ college scholarship amounts, and their  
12 dependents’ names—and perhaps more. Plaintiffs further allege this occurred regardless of  
13 whether the filer had an account on Meta’s social media platforms like Facebook or Instagram,  
14 and even when filers expressly declined to share their information, the Pixel collected it anyway.  
15 (Doe ¶¶ 1-2; Calderon ¶¶ 43-51; Craig ¶¶ 2-18);  
16

17           WHEREAS, in light of the foregoing, the Related Actions should be consolidated for all  
18 purposes pursuant to Rule 42(a) of the Federal Rules of Civil Procedure;

19           WHEREAS, the parties have met and conferred and stipulate to the following:

20           1.       The case file for the Consolidated Action will be maintained under Master File  
21 No.3:22-CV-07557-SI. When a pleading is intended to apply to all actions to which this Order  
22 applies, the words “All Actions” shall appear immediately after the words “This Document Relates  
23 To:” in the caption described above. When a pleading is not intended to apply to all actions, the  
24 docket number for each individual action to which the paper is intended to apply and the last name  
25  
26

of the first-named plaintiff in said action shall appear immediately after the words “This Document Relates To:” in the caption identified above, for example, “3:22-cv-07557-SI, All Actions.”

2. All papers filed in the Consolidated Action shall be filed under Case No. 3:22-cv-007557-SI and shall bear the following caption:

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE META PIXEL TAX FILING CASES ) Master File No. 3:22-cv-07557-SI  
This Document Relates to: )  
 )

3. Any action subsequently filed, transferred, or removed to this Court that the Court determines arises out of the same or similar operative facts as the Consolidated Action will be, with the Court's approval, consolidated with the Consolidated Action for all purposes. Any party may file a Notice of Related Action pursuant to Civil Local Rule 3.12 whenever a party believes a case that should be consolidated into the Consolidated Action is filed in, or transferred to, this District. If the Court determines that the case is related and should be consolidated, the clerk shall:

- a. place a copy of this Order in the separate file for such action;
  - b. serve on Plaintiffs' counsel in the new case a copy of this Order;
  - c. direct that this Order be served upon defendants in the new case; and
  - d. make the appropriate entry in the Master Docket.

4. A Consolidated Complaint shall be filed forty-five (45) days after entry of an order appointing interim class counsel in the Consolidated Action.

5. Meta shall not be required to respond to the complaint in any action consolidated into this action, other than the Consolidated Complaint.

6. Meta shall respond to the Consolidated Complaint within sixty (60) days of the filing thereof. If Meta files a motion to dismiss the Consolidated Complaint, Plaintiffs shall file their papers in opposition to Meta's motion to dismiss within forty-five (45) days of the filing thereof. Meta shall file its reply brief within thirty (30) days of the filing of Plaintiffs' opposition papers.

7. Plaintiffs shall promptly confer on a leadership structure and file any stipulation or motion within five (5) days after entry of the Order consolidating all actions.

## IT IS SO STIPULATED

Dated: February 7, 2023

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By: /s/ Rebecca A. Peterson

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Dated: February 8, 2023

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*Attorneys for Plaintiffs Katrina Calderon and  
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Dated: February 7, 2023

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16 *Attorneys for Plaintiffs Jane Doe and John Doe*

17 Dated: February 7, 2023

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28 STIPULATION AND [PROPOSED] ORDER  
TO ADMINISTRATIVELY RELATE ACTIONS UNDER CIVIL LOCAL RULE 12-3 AND TO  
CONSOLIDATE RELATED ACTIONS UNDER FED.R.CIV.P. 42(a)  
Case No. 3:22-cv-07557-SI

## **Certification of Compliance with Civil Local Rule 5-1(i)(3)**

I hereby certify that pursuant to Civil Local Rule 5-1(i)(3), I have obtained the authorization from the above signatories to file the above-referenced document, and that the above signatories concur in the filing's content.

By: /s/ Marshal J. Hoda

1                   **[PROPOSED] ORDER**  
2  
3

4 PURSUANT TO STIPULATION, IT IS SO ORDERED.  
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6

7 Dated: February 8, 2023  
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10                     
11                   \_\_\_\_\_  
12                   Hon. Susan Illston  
13                   U.S. DISTRICT COURT JUDGE  
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